

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

WINNIE JACKSON, JARRETT “JAY”
JACKSON, CELINA VASQUEZ, DUANE
BRAZTON, NADIA BHULAR, AMJAD
BHULAR, CHERYL MILLS-SMITH, and
RICHARD CANADA,

Plaintiffs,

v.

Civil Case No. 4:25-cv-000587-O

TARRANT COUNTY, TEXAS;
TARRANT COUNTY COMMISSIONERS
COURT; TIM O’HARE, in his official
capacity as Tarrant County Judge,

Defendants.

DEFENDANTS’ MOTION TO DISMISS

Defendants move to dismiss Plaintiffs’ complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) because Plaintiffs’ pleadings demonstrate that: (1) this Court lacks subject-matter jurisdiction; (2) Plaintiffs failed to state a claim upon which relief can be granted; and (3) Plaintiffs have failed to state facts supporting a constitutional basis for recovery.

Dated: August 1, 2025

Respectfully submitted,

For the Defendants

/s/ Joseph M. Nixon

Joseph M. Nixon
PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street
Alexandria, VA 22413
Tel: (703) 745-5870
jnixon@publicinterestlegal.org

J. Christian Adams*
PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street
Alexandria, VA 22413
Tel: (703) 745-5870
adams@publicinterestlegal.org
*Motions for Pro Hac Admission forthcoming

Kaylan Phillips*
PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street
Alexandria, VA 22413
Tel: (703) 745-5870
kphillips@publicinterestlegal.org
*Motions for Pro Hac Admission forthcoming

Jewel M. Lightfoot
PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street
Alexandria, VA 22413
Tel: (703) 745-5870
jlightfoot@publicinterestlegal.org

Stephen A. Lund
State Bar No. 24086920
Tarrant County District Attorney's Office
401 W. Belknap St., 9th Floor
Fort Worth, TX 76196
Tel: (817) 884-1400
Fax: (817) 884-1475
SALund@tarrantcountytexas.gov

Katherine E. Owens
State Bar No. 24081683
Tarrant County District Attorney's Office
401 W. Belknap St., 9th Floor
Fort Worth, TX 76196
Tel: (817) 884-1400
Fax: (817) 884-1475
KEOwens@tarrantcountytexas.gov

Omar J. Famada
State Bar No. 24144940
Tarrant County District Attorney's Office
401 W. Belknap St., 9th Floor
Fort Worth, TX 76196

Tel: (817) 884-1400
Fax: (817) 884-1475
OJFamada@tarrantcountytexas.gov

CERTIFICATE OF SERVICE

I, Joseph M. Nixon, do hereby certify that service of a true and correct copy of this document has been forwarded to all counsel of record via electronic notification and sent to non-parties via regular and/or certified mail.

DATED: August 1, 2025

For the Defendants

/s/ Joseph M. Nixon
Joseph M. Nixon
PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street
Alexandria, VA 22413
Tel: (703) 745-5870
jnixon@publicinterestlegal.org